

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Southwest Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Virginia House Furniture Corporation  
Atkins, Smyth County, Virginia  
Permit No. SWRO10207

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Virginia House Furniture Corporation has applied for a Title V Operating Permit for its Atkins, Virginia - Plant 1 facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact:\_\_\_\_\_ Date:\_\_\_\_\_

Air Permit Manager:\_\_\_\_\_ Date:\_\_\_\_\_

Deputy Regional Director:\_\_\_\_\_ Date:\_\_\_\_\_

## **FACILITY INFORMATION**

### Permittee

Vaughan-Bassett Furniture Co.  
dba Virginia House Furniture Corp.  
300 East Grayson Street  
Galax, Virginia 24333

### Facility

Virginia House Furniture Corporation  
5781 Atkins Tank Road  
(Intersection of State Routes 686 and 625)

AFS ID No. 51-173-00036

## **SOURCE DESCRIPTION**

SIC Code: 2511 - Manufacture of wood furniture

The company manufactures chairs and other furniture pieces. The operation includes two wood-fired boilers used to provide steam for kiln drying rough lumber. The dried lumber is then processed by various woodworking equipment, such as saws, sanders, lathes, planers, etc., to fabricate furniture pieces. The furniture pieces are then assembled and finished in several spray booths to provide protective coatings. The finished product is then packaged for shipment.

The facility is a Title V major source of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions. This source is located in an attainment area for all pollutants. The facility currently does not operate under a NSR permit.

## **COMPLIANCE STATUS**

The facility is typically inspected once per year. The facility was last inspected on February 12, 2003 and was found not to be in compliance with terms of the current Title V permit. The company submitted a compliance plan that included proposed changes to the periodic monitoring language of the Title V permit related to visible emissions evaluations. The company complied with requested changes in recordkeeping and monitoring. As a consequence, DEQ determined that the source is now operating in compliance.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

| Emission Unit ID              | Stack ID      | Emission Unit Description   | Size/Rated Capacity     | Pollution Control Device Description (PCD) | PCD ID      | Pollutant Controlled | Applicable Permit Date |
|-------------------------------|---------------|---|-------------------------|--|-------------|----------------------|------------------------|
| <b>Fuel Burning Equipment</b> |               |   |                         |  |             |                      |                        |
| ES-1                          | EP-1          | Farrar and Trefts wood-fired boiler Model No. 2191 – installed 1947 | 14.5 million Btu/hr     | Zurn Multicyclone                          | CD-6        | PM                   | -                      |
| ES-2                          | EP-2          | Walsh and Weidner wood-fired boiler Model No. 1784 – installed 1960 | 16.5 million Btu/hr     | Zurn Multicyclone                          | CD-7        | PM                   | -                      |
| <b>Finishing Operations</b>   |               |   |                         |  |             |                      |                        |
| ES-3                          | EP-3 – EP-11  | 9 spray booths  | Varies                  | baffles on six booths                      | -           | PM                   | -                      |
| <b>Wood Drying</b>            |               |   |                         |  |             |                      |                        |
| ES-4                          | --            | Lumber Dry Kilns  | 385,000 bd-ft/two weeks | -  | -           | -                    | -                      |
| <b>Woodworking</b>            |               |   |                         |  |             |                      |                        |
| ES-5                          | EP-12 - EP-16 | Various saws, sanders, shapers, and CNC router (R-1).               | Varies                  | Five Carter Day baghouses                  | CD-1 - CD-5 | PM                   | -                      |

## EMISSIONS INVENTORY

Emissions are summarized in the following tables.

2002 Actual Emissions

| Emission Unit | 2002 Criteria Pollutant Emission in Tons/Year |      |                 |                  |                 |
|---------------|---|------|-----------------|------------------|-----------------|
|               | VOC   | CO   | SO <sub>2</sub> | PM <sub>10</sub> | NO <sub>x</sub> |
| ES-1 & ES-2   | 0.5   | 23.6 | 1.0             | 5.6              | 19.3            |
| ES-3          | 0   | -    | -               | 0                | -               |
| ES-4          | 1.1   | -    | -               | -                | -               |
| ES-5          | -   | -    | -               | 0                | -               |
| Total         | 1.6   | 23.6 | 1.0             | 5.6              | 19.3            |

2002 Facility Hazardous Air Pollutant Emissions

| Pollutant               | 2002 Hazardous Air Pollutant Emission in Tons/Yr |
|-------------------------|--|
| Hydrochloric acid (gas) | 0.74   |
|                         |  |

## EMISSION UNIT APPLICABLE REQUIREMENTS – Boilers ES-1 & ES-2

### Limitations

The two boilers were installed prior to 1972, and are not permitted. Therefore, certain provisions of 9 VAC 5 Chapter 40 are considered applicable requirements. The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-900, Standard for Particulate Matter (PM) - These units are subject to emission standards outlined in 9 VAC 5-40, Article 8. Since the boilers were installed prior to 1979, by definition, they are together considered a fuel burning equipment installation. According to 9 VAC 5-40-900 A.1.b, an installation may not emit more particulate matter than can be calculated by the formula:

$$E = 1.0906 H^{-0.2594}$$

where E is particulate emissions in lb/MMBtu and H is the total heat rating of the installation (31 MMBtu/hr). The resulting particulate matter emission ratio is,

$$E = 1.0906(31)^{-0.2594} \text{ lb/MMBtu} = 0.45 \text{ lb/MMBtu}$$

9 VAC 5-40-930, Standard for Sulfur Dioxide - Sulfur dioxide emissions from installations are limited according to the formula:

$$S = 2.64 K \quad \text{where, } S \text{ is lb/hr of SO}_2, \text{ and} \\ K \text{ is the heat capacity of the unit (MMBtu/hr).}$$

**ES-1 & ES-2**  $(2.64)(31.0) = 81.8 \text{ lb/hr SO}_2$

9 VAC 5-40-940, Standard for Visible Emissions - Opacity is limited to 20%, except for one 6-minute period within one hour not to exceed 60%.

### Monitoring

The monitoring and recordkeeping requirements of 9 VAC 5 chapter 40 have been modified to meet Part 70 requirements.

Compliance with the emission limits can be demonstrated by computations involving acceptable emission factors as shown below:

$$E = F \times W, \text{ where}$$

E = Emission rate (lb/time period)

F = Emission factors from SCC 1-02-009-06 shown below

PM = 1.3 lb/T of woodwaste (accounting for 85% control by multiclone)

SO<sub>2</sub> = 0.15 lb/T of woodwaste

W = Wood combusted (T/time period)

The calculated emission rates can be compared to the maximum allowable emission rate given by:

**ES-1**  $(14.5 \text{ MMBtu/hr})(0.45 \text{ lb/MMBtu}) = 6.5 \text{ lb/hr PM}$

**ES-2**  $(16.5 \text{ MMBtu/hr})(0.45 \text{ lb/MMBtu}) = 7.4 \text{ lb/hr PM}$

Compliance will be confirmed if the calculated emission rate is less than the maximum allowable emission rate. Using a conservative heating value of 6,000 Btu/lb of dry woodwaste, maximum expected emissions are:

**ES-1**

PM  $(14.5 \times 10^6 \text{ Btu/hr}/6000 \text{ Btu/lb})(1 \text{ T}/2000 \text{ lb})(1.3 \text{ lb/T}) = 1.6 \text{ lb/hr}$

**ES-2**

PM  $(16.5 \times 10^6 \text{ Btu/hr}/6000 \text{ Btu/lb})(1 \text{ T}/2000 \text{ lb})(1.3 \text{ lb/T}) = 1.8 \text{ lb/hr}$

**ES-1 & ES-2**

SO<sub>2</sub>  $(31 \times 10^6 \text{ Btu/hr}/6000 \text{ Btu/lb})(1 \text{ T}/2000 \text{ lb})(0.15 \text{ lb/T}) = 0.39 \text{ lb/hr}$

These values are well below allowable emissions. Therefore, as long as the boilers are operated properly, compliance with the emission standards is expected. Violation of the particulate matter emission standards would be extremely unlikely under normal operating conditions. Compliance has traditionally been determined using opacity as an indicator of particulate matter emissions. Compliance with the particulate matter standards may be determined by periodic visible emissions checks on the boiler exhausts as explained below, and annual multiclone inspections. Compliance with the SO<sub>2</sub> emission standards will be insured by virtue of the low sulfur content of typical woodwaste. No other monitoring will be required. The permit identifies wood as the approved fuel.

The permit contains a requirement to perform weekly visible emission observations on the boiler stacks. If visible emissions are present at a level above 10% opacity, a six-minute visible emission evaluation (VEE) must be performed according to 40 CFR 60, Appendix A, Method 9. If during the six minutes, the average opacity exceeds 20%, the company must then take corrective action. If corrective action fails to produce opacity less than 20%, an 18-minute VEE using 40 CFR 60, Method 9 is required to determine compliance. Instances of excess emissions will be recorded and reported. The observer must be Method 9 certified. This will satisfy the periodic monitoring requirement for the visible emission limitation included in the permit.

Both boilers have been fitted with multicyclones for particulate matter control. Such control devices, if properly operated and maintained, should help insure compliance with the opacity requirements. An annual multiclone inspection will be required to insure structural integrity.

### **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include results of visible emissions checks as determined on a weekly basis and annual multiclone inspection results.

### **Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### **Reporting**

There are no specific reporting requirements for the two boilers.

### **Streamlined Requirements**

The company did not propose any specific streamlining regarding the boilers.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Finishing Operations (ES-3)**

### **Limitations**

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-60-100, EPA National Emission Standards for Hazardous Air Pollutants for Source Categories - Wood Furniture Manufacturing Operations - 40 CFR 63.800 - 819. The company has already made necessary changes to coating application systems which enable it to comply with these requirements. The company proposes to use compliant coatings.

9 VAC 5-40-80, Standard for Visible Emissions - 20% opacity except for one 6-minute period not to exceed 60%.

9 VAC 5-40-260, Standard for Particulate Matter - Process Weight Rate Table  
Particulate matter emissions from general processes are not to exceed corresponding quantities given by the formula,  $E = 4.10 P^{0.67}$ , where P is the process weight rate in tons per hour. This standard applies to each emission unit individually.

### **Monitoring**

The monitoring and recordkeeping requirements of 9 VAC 5 chapter 40 have been modified to meet Part 70 requirements. The monitoring requirements of the Wood Furniture Manufacturing MACT (40 CFR 63, Subpart JJ) are included in the permit. These provisions meet periodic monitoring requirements.

Particulate matter emission rates are not expected to approach the above-mentioned standard since the coating materials are not likely to contain such quantities of solids, the particulate transfer efficiency will reduce potential particulate emissions, and six of the nine spray booths are equipped with baffles for further particulate control. The company will calculate particulate matter emissions using a mass balance for each material sprayed, accounting for solids content of the material, particulate transfer efficiency, and an estimated 30% control from baffles. The company will be required to base emission calculations on monthly usage divided by hours of operation for each month, divided by the number of spray booths. This will result in an average hourly particulate matter emission rate for each existing spray booth. This figure will be compared to the result of the formula above to show compliance. The company will be required to track process weight rates in order to show compliance with the formula-based standard.

Compliance with the opacity requirement is expected. Particulate emissions from most spray booths are controlled through the use of baffles. The permit contains a requirement to perform weekly visible emission observations on the spray booth exhausts. If visible emissions are present at a level above 10% opacity, a six-minute visible emission evaluation (VEE) must be performed according to 40 CFR 60, Appendix A, Method 9. If during the six minutes, the average opacity exceeds 20%, the company must then take corrective action. If corrective action fails to produce opacity less than 20%, an 18-minute VEE using 40 CFR 60, Method 9 is required to determine compliance. Instances of excess emissions will be recorded and reported. The observer must be Method 9 certified. This will satisfy the periodic monitoring requirement for the visible emission limitation included in the permit.

## **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include results of visible emissions checks and emission calculations.

## **Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## **Reporting**

There are no specific reporting requirements for the finishing operations other than those required by the Wood Furniture Manufacturing MACT (see Facility-Wide Requirements).

## **Streamlined Requirements**

The company did not propose any specific streamlining regarding the finishing operations.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Woodworking Operations (ES-5)**

### **Limitations**

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-2270, Standard for Particulate Matter - Requires the source to collect particulate matter emissions from woodworking equipment, and requires particulate matter emissions to meet a concentration of 0.05 gr/dscf of exhaust gas.

9 VAC 5-40-2280, Standard for Visible Emissions – Visible emissions must meet a 20% opacity requirement, except for one 6-minute period not to exceed 60% opacity.

9 VAC 5-40-2290, Standard for Fugitive Dust/Emissions – The source must use reasonable precautions to prevent fugitive dust, including covering conveying equipment.

9 VAC 5-50-80, Standard for Visible Emissions (New Sources) – Visible emissions must meet 20% opacity requirement, except for one 6-minute period not to exceed 30% opacity. This applies to a new router (R-1) that is controlled by the existing dust collection system.



## **Monitoring**

The monitoring and recordkeeping requirements of 9 VAC 5 chapter 40 have been modified to meet Part 70 requirements.

The woodworking equipment in operation is required to meet a particulate emission limitation of 0.05 gr/dscf of exhaust gas. As long as the PM emissions are vented through a properly operating control device, the standard is readily attained. PM emissions are vented through baghouses that are reportedly capable of achieving 99.9% control. Therefore, as long as the control devices are properly maintained and operated, there is little likelihood of violating the 0.05 gr/dscf standard.

The permit contains a requirement to perform weekly visible emission observations on each baghouse exhaust. If visible emissions are present at a level above 10% opacity, a six-minute visible emission evaluation (VEE) must be performed according to 40 CFR 60, Appendix A, Method 9. If during the six minutes, the average opacity exceeds 20%, the company must then take corrective action. If corrective action fails to produce opacity less than 20%, an 18-minute VEE using 40 CFR 60, Method 9 is required to determine compliance. Instances of excess emissions will be recorded and reported. The observer must be Method 9 certified.

Compliance with the opacity standard will indicate that the control equipment is operating properly and will show compliance with the PM standard.

The weekly visible emission evaluations (VEEs) will also satisfy the periodic monitoring requirement for the visible emission limitation. Frequent checks for visible emissions will limit malfunctions of the control equipment. As long as the control equipment is operating properly, there is little likelihood of violating the visible emission limitation.

The weekly visible emission evaluations (VEEs) also satisfy the periodic monitoring requirements for the individual woodworking equipment units.

## **Recordkeeping**

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include annual wood processing rates and the results of the weekly baghouse evaluations.

## **Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## **Reporting**

There are no specific reporting requirements for the woodworking operations.

## **Streamlined Requirements**

Because some woodworking equipment was installed after 1972, it is subject to new source requirements in 9 VAC 5-50-80, Standard for Visible Emissions, while the remainder of the facility is subject to existing source requirements in 9 VAC 5-40-80. The requirements are essentially the same (20% opacity), except that existing sources are limited to one 6-minute period not to exceed 60% opacity, rather than 30% for new sources. In order to simplify the determinations as to which baghouse is subject to a different standard, the new source requirements are applied to all woodworking equipment in the Title V permit.

The fugitive dust requirements for existing and new sources are found in separate regulations, which include identical standards. For simplicity in determining which unit may be subject to which regulation, the permit requires that provisions of 9 VAC 5-50-90 apply to all woodworking units.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - Facility-Wide Requirements**

### **Limitations**

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-60-90, EPA NESHAPs - The company is subject to 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations (Wood Furniture MACT). All limitations from the Wood Furniture MACT have been included in the permit. 40 CFR 63 Subpart A, General Provisions also applies to the source. Any applicable limitations from the general provisions are also included in the permit.

### **Monitoring**

The Wood Furniture MACT contains requirements for continuous compliance, including monthly and/or daily recordkeeping depending on the method of compliance. These requirements have been incorporated in the permit. The Wood Furniture MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit. The company has elected to demonstrate compliance by using only those coatings that meet MACT requirements.

### **Recordkeeping**

The Wood Furniture MACT contains requirements for recordkeeping, including maintaining certified product data sheets for each material used and all calculations used to demonstrate continuous compliance. No additional recordkeeping has been included in the Title V permit.

### **Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not

included in this permit if necessary to determine compliance with an emission limit or standard.

## **Reporting**

The Wood Furniture MACT requires that a source reports compliance status annually, as well as demonstrates continuous compliance semi-annually. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in 9 VAC 5-80-110.

## **Streamlined Requirements**

The initial notification requirements associated with the Wood Furniture MACT have not been included in the permit because the source has already completed the notifications.

The company has opted not to use a control device to meet the MACT requirements. Therefore, all requirements regarding a control device have been excluded from the permit.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

The permit contains references to the administrative requirements outlined in 9 VAC 5 Chapter 20. 9 VAC 5 Chapter 40, Part I identifies general requirements for existing sources. The provisions of 9 VAC 5-40-20 outline compliance demonstrations by existing sources. The company listed this general requirement for existing sources which details how compliance will be determined in the case where stack testing or specific monitoring devices are required.

## **Comments on General Conditions**

### **B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §§2.1-20.01:2 and §§10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement NO. 1-2002".

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

## **F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emissions reporting within four hours of discovery. Section 9 VAC 5-80-250 also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to 9 VAC 5-20-180 including Title V facilities. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours after discovery of the malfunction.

This general condition cites the sections that follow:

- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting

## **J. Permit Modification**

This general condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit for Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits for New and Modified Stationary Sources
- 9 VAC 5-80-1790. Applicability, Permits for Major Stationary Sources and Modifications Locating in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

## **U. Failure/Malfunction Reporting**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on General Condition F.

This general condition cites the sections that follow:

- 9 VAC 5-80-110. Permit Content
- 9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

## **Y. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

- 40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
- 40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
- 40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste

disposal.

## STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and are not included in the Title V permit:

9 VAC 5 Chapter 40, Part II, Article 2 – Emission Standards for Odor – states that the company may not discharge emissions causing objectionable odor. This requirement is not included in the State Implementation Plan and is considered state-only enforceable.

9 VAC 5 Chapter 60, Part II, Article 4 – Emission Standards for Toxic Pollutants from Existing Sources – requires the company to comply with emission standards for toxic air pollutants. This requirement is not included in the State Implementation Plan and is considered state-only enforceable.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

## FUTURE APPLICABLE REQUIREMENTS

The company did not identify any future applicable requirements in the application. A MACT for Industrial Boilers that could have an impact on this source is not yet final. Therefore, no future applicable requirements have been included in the permit.

## INAPPLICABLE REQUIREMENTS

The company indicated that the requirements of 112(r) of the Clean Air Act do not currently apply to this facility. The company did not identify any other inapplicable requirements.

**NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**, 40 CFR 60.40c - 48c, does not apply to the two boilers at the facility since they were installed prior to 1989.

**NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984**, 40 CFR 60.110b – 117b, does not apply to two 4000-gallon storage tanks at the plant. These units are well below the 40 m<sup>3</sup> (10,567 gallons) capacity

threshold for applicability of this rule.

## INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

| Emission Unit No. | Emission Unit Description | Citation <sup>1</sup><br>(9 VAC_) | Pollutant Emitted<br>(5-80-720 B.) | Rated Capacity<br>( 5-80-720 C.) |
|-------------------|---------------------------|-----------------------------------|------------------------------------|----------------------------------|
| ES-4              | Lumber Dry kilns          | 9 VAC 5-80-720 B                  | VOC                                | ----                             |
| BST-1             | Sealer Bulk Storage Tank  | 9 VAC 5-80-720 B                  | VOC                                | ----                             |
| BST-2             | Lacquer Bulk Storage Tank | 9 VAC 5-80-720 B                  | VOC                                | ----                             |

<sup>1</sup>The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

## CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

## PUBLIC PARTICIPATION

The draft permit was placed on public notice in the *Smyth County News & Messenger* on July 16, 2003. The 30-day comment period expired on August 16, 2003. No public comments were received. The permit and documents were submitted as "proposed" to EPA on August 18, 2003. The 45-day EPA review period expired on October 2, 2003. No comments were received.